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May 27, 2022

Via ECF

The Honorable Sarah Netburn
Thurgood Marshall United States Courthouse
40 Foley Square, Room 430
New York, NY 10007

Re: *In re Terrorist Attacks on September 11, 2001*, 03-md-1570 (GBD) (SN)

Dear Judge Netburn:

As directed by the Court's order by memorandum endorsement of April 4, 2022, ECF No. 7827, I write on behalf of Defendant Kingdom of Saudi Arabia ("Saudi Arabia") to bring the Court up to date on the status of the parties' efforts to propose redactions in accordance with the Court's November 24, 2020 order, ECF No. 6541. The Plaintiffs' Executive Committees ("Plaintiffs"), the Federal Bureau of Investigation ("FBI"), and Defendant Dallah Avco all join in this letter.

On May 10 and 19, 2022, Saudi Arabia and Plaintiffs filed previously sealed documents on the public docket based on the Court's May 9, 2022 order. On May 27, 2022, Saudi Arabia circulated proposed redactions for filings related to the Court's January 14, 2022 order. Saudi Arabia will continue to circulate proposed redactions to outstanding sealed filings as appropriate.

Plaintiffs are continuing to review the redactions proposed by Saudi Arabia.

As noted in the parties' prior status reports, to the extent any information in the parties' sealed filings implicates records produced by the FBI pursuant to the FBI Protective Order, the FBI understands that the parties will provide the FBI with proposed redacted versions of those filings that reflect the redactions set forth in documents publicly released pursuant to section 2 of Executive Order 14040.

Dallah Avco is continuing to review the redactions proposed by the parties.

Counsel for all parties will continue to work to move this process forward. Subject to the Court's approval, we propose to submit another joint status letter on or before July 26, 2022.

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Respectfully submitted,

/s/ Michael K. Kellogg

Michael K. Kellogg
Counsel for the Kingdom of Saudi Arabia

cc: All MDL Counsel of Record (via ECF)